

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
)	CRIMINAL ACTION
V.)	NO. 4:13-cr-40027-TSH
)	
GREGORY GUERTIN,)	
Defendant)	
_____)	

DEFENDANT’S MOTION TO FILE A SEALED DOCUMENT

NOW COMES Daniel W. Cronin, counsel for the defendant Gregory Guertin, and in accordance with the provisions of LR. 7.2, moves that this Honorable Court allow the defendant to file a sealed document.

The document that defense counsel intends to file is entitled “ASSENTED-TO MOTION TO CONTINUE SENTENCING HEARING FOR 90 DAYS”. The request to file this sealed document relates to the specific reasons for the proposed continuance of defendant’s sentencing hearing, currently scheduled for September 11, 2014, which reasons are set forth in the proposed sealed request for continuance. The defendant is not in custody and is in compliance with the terms of his pre-trial release. The government, through AUSA Scott Garland, assents to this request.

WHEREFORE, defense counsel requests that he be permitted to file a sealed document in the circumstances.

Respectfully submitted,

THE DEFENDANT,
GREGORY GUERTIN,
By His Attorney,

/s/ Daniel W. Cronin
Daniel W. Cronin, Esquire
One Exchange Place
Worcester, MA 01608
(508) 795-0900
B.B.O. # 548200

DATED: August 26, 2014

DEFENDANT'S CERTIFICATE OF SERVICE ON ASSENTED-TO
MOTION TO CONTINUE SENTENCING HEARING FOR 90 DAYS

I, Daniel W. Cronin, attorney for the defendant, hereby certify that the document entitled DEFENDANT'S MOTION TO FILE A SEALED DOCUMENT was filed through the ECF system and will be sent electronically to the registered participants as identified in the Notice of Filing (NEF) and to Pre-Trial Services by electronic mail on same date.

/s/ Daniel W. Cronin
Daniel W. Cronin, Esquire

DATED: August 26, 2014